

**Hearing Date and Time: August 26, 2021, at 11:00 a.m. (Prevailing Eastern Time)**

Richard J. Cooper  
Lisa M. Schweitzer  
Luke A. Barefoot  
Thomas S. Kessler  
CLEARY GOTTlieb STEEN & HAMILTON LLP  
One Liberty Plaza  
New York, New York 10006  
Telephone: (212) 225-2000  
Facsimile: (212) 225-3999

*Counsel to the Debtors  
and Debtors-in-Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

LATAM Airlines Group S.A., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No.: 20-11254

Jointly Administered

**AGENDA OF MATTERS SCHEDULED FOR  
HEARING ON AUGUST 26, 2021 AT 11:00 A.M.**

**Time and Date of Hearing:** August 26, 2021 at 11:00 a.m. (Prevailing

---

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number (as applicable), are: LATAM Airlines Group S.A. (59-2605885); Lan Cargo S.A. (98-0058786); Transporte Aéreo S.A. (96-9512807); Inversiones Lan S.A. (96-5758100); Technical Training LATAM S.A. (96-847880K); LATAM Travel Chile II S.A. (76-2628945); Lan Pax Group S.A. (96-9696800); Fast Air Almacenes de Carga S.A. (96-6315202); Línea Aérea Carguera de Colombia S.A. (26-4065780); Aerovías de Integración Regional S.A. (98-0640393); LATAM Finance Ltd. (N/A); LATAM-Airlines Ecuador S.A. (98-0383677); Professional Airline Cargo Services, LLC (35-2639894); Cargo Handling Airport Services LLC (30-1133972); Maintenance Service Experts LLC (30-1130248); Lan Cargo Repair Station LLC (83-0460010); Prime Airport Services, Inc. (59-1934486); Professional Airline Maintenance Services LLC (37-1910216); Connecta Corporation (20-5157324); Peuco Finance Ltd. (N/A); LATAM Airlines Perú S.A. (52-2195500); Inversiones Aéreas S.A. (N/A); Holdco Colombia II SpA (76-9310053); Holdco Colombia I SpA (76-9336885); Holdco Ecuador S.A. (76-3884082); Lan Cargo Inversiones S.A. (96-9696908); Lan Cargo Overseas Ltd. (85-7752959); Mas Investment Ltd. (85-7753009); Professional Airlines Services Inc. (65-0623014); Piquero Leasing Limited (N/A); TAM S.A. (N/A); TAM Linhas Aéreas S.A. (65-0773334); ABSA Aerolinhas Brasileiras S.A. (98-0177579); Prismah Fidelidade Ltda. (N/A); Fidelidade Viagens e Turismo S.A. (27-2563952); TP Franchising Ltda. (N/A); Holdco I S.A. (76-1530348) and Multiplus Corretora de Seguros Ltda. (N/A). For the purpose of these Chapter 11 Cases, the service address for the Debtors is: 6500 NW 22nd Street Miami, FL 33131.

Eastern Time)

**Location of Hearing:**

The Honorable Judge Garrity, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, NY 10004. In light of COVID-19, the hearing will only be conducted telephonically. Parties wishing to participate in must make arrangements through CourtSolutions LLC ([www.court-solutions.com](http://www.court-solutions.com)). The filing and service deadline of any objections or responses to entry of a final order is listed below for each motion and application.

**Copies of Motions:**

Copies of the pleadings can be viewed and/or obtained by: (i) accessing the Court's website at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), or (ii) from the Debtors' notice and claims agent, Prime Clerk LLC, located at One Grand Central Place, 60 East 42<sup>nd</sup> Street, Suite 1440, New York, New York 10165, at <https://cases.primeclerk.com/LATAM> or by calling +1 212 257 5450. Note that a PACER password is needed to access documents on the Court's website.

**I. STATUS CONFERENCE:**

**1. Case Conference**

**II. UNCONTESTED MATTERS**

**2. Omnibus Claims Objection Motion (Duplicate).** *Debtors' Sixteenth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 (Duplicate).* [Solely with Respect to Claim No. 2011]. ECF No. 1889.

i. **Response Deadline:** August 19, 2021 at 4:00 P.M.

ii. **Responses Received:** None.

iii. **Related Documents:**

1. *Notice of Adjournment of Debtors' Sixteenth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. § 502 and Fed. R. Bankr. P. 3007 Solely with Respect to Claim No. 2011 Filed by Cargo Force, Inc.* ECF No. 2049.

2. *Second Notice of Adjournment of Hearing of Debtors' Sixteenth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 Solely with Respect to Claim No. 2011 Filed by Cargo Force, Inc.* ECF

No. 2206.

3. *Third Notice of Adjournment of Hearing on Debtors' Sixteenth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 Solely with Respect to Claim No. 2011 filed by Cargo Force, Inc.* ECF No. 2533.

4. *Fourth Notice of Adjournment of Hearing on Debtors' Sixteenth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 Solely with Respect to Claim No. 2011 filed by Cargo Force, Inc.* ECF No. 2755.

iv. **Status:** This matter is proceeding on an uncontested basis, solely with respect to Claim No. 2011.

3. **WeWork Claim Objection Motion (Substantive).** *Debtors' Objection Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 to Claim Number 1031 Filed by WeWork Chile SpA (Reduce and Allow).* ECF No. 2734.

i. **Response Deadline:** August 16, 2021 at 4:00 P.M.

ii. **Responses Received:** None.

iii. **Related Documents:** None.

iv. **Status:** This matter is proceeding on an uncontested basis.

4. **Omnibus Union Claims Objection Motion (Substantive).** *Debtors' Twenty-Ninth Omnibus Objection (Substantive) to Certain Claims Filed by Unions Pursuant to 11 U.S.C. 502(b)(1) and Fed. R. Bankr. P. 3007 (No Liability).* [Solely with respect to Claim No. 2346]. ECF No. 2756.

i. **Response Deadline:** August 19, 2021 at 4:00 P.M.

ii. **Responses Received:**

1. *Contestacion a la Impugnacion General y Acompaña Documentos.*<sup>2</sup> ECF No. 2971.

2. Informal Undocketed Response from Sindicato de Trabajadores de Lan Chile S.A.

iii. **Related Documents:**

---

<sup>2</sup> As per the direction of chambers, the Debtors are in the process of obtaining certified translations of this objection and the informal comments, which will be filed in advance of the September omnibus hearing.

1. *Notice of Adjournment of Hearing on Debtors' Twenty-Ninth Omnibus Objection (Substantive) to Certain Claims filed by Certain Unions Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 (No Liability) Solely with Respect to Claim Nos. 1242, 1243, and 2266.* ECF No. 2972.
- iv. **Status:** This matter is proceeding on an uncontested basis, solely with respect to Claim No. 2346.
5. **Claim No. 3951 Objection Motion.** *Debtors' Objection to Claim No. 3951 Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 (Reduce and Allow).* ECF No. 2758.
  - i. **Response Deadline:** August 19, 2021 at 4:00 P.M.
  - ii. **Responses Received:**
    1. The Claimant provided informal comments.
  - iii. **Related Documents:** None.
  - iv. **Status:** This matter is proceeding on an uncontested basis.
6. **Omnibus Claims Objection Motion (Non-Substantive).** *Debtors' Thirtieth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. Section 502 and Fed. R. Bankr. P. 3007 (Amended, Duplicate, No Liability, Satisfied and Modified).* ECF No. 2759.
  - i. **Response Deadline:** August 19, 2021 at 4:00 P.M.
  - ii. **Responses Received:** None.
  - iii. **Related Documents:**
    1. *Notice of Withdrawal of Debtors' Thirtieth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. Section 502 and Fed. R. Bankr. P. 3007 Solely with Respect to Claim No. 784 filed by East Coast Tank Sealing, Inc.* ECF No. 2770.
    2. *Notice of Revised Proposed Order Pursuant to the Debtors' Thirtieth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007.* ECF No. 2777.
    3. *Notice of Withdrawal of Debtors' Thirtieth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. Section 502 and Fed. R. Bankr. P. 3007 Solely with Respect to*

*Claim No. 3097 Filed by Wilmington Trust SP Services (Dublin) Limited.* ECF No. 2787.

4. *Notice of Revised Exhibit A and Revised Proposed Order to Debtors' Thirtieth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 2007 (Amended, Duplicate, No Liability, Satisfied and Modified).* ECF No. 2852.
5. *Notice of Withdrawal of Objection Solely with Respect to Claim Nos. 3148 and 3185 Included in the Debtors' Thirtieth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 (Amended, Duplicate, No Liability, Satisfied, and Modified).* ECF No. 2912.
6. *Notice of Withdrawal of Objection Solely with Respect to Claim Nos. 3148 and 3185 Included in the Debtors' Thirtieth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. Section 502 and Fed. R. Bankr. P. 3007 (Amended, Duplicate, No Liability, and Satisfied and Modified).* ECF No. 2914.
7. *Notice of Withdrawal of Debtors' Thirtieth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 Solely With Respect to Claim Nos. 2916, 3434 and 3435.* ECF No. 2925.
8. *Notice of Withdrawal of Debtors' Thirtieth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 Solely with Respect to Claim No. 6130 Filed by Jamaica Civil Aviation Authority.* ECF No. 2926.
9. *Notice of Adjournment of Hearing of Debtors' Thirtieth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 Solely with Respect to Claim No. 2697 filed by Dester Corporation.* ECF No. 2969.
10. *Notice of Adjournment of Hearing on Debtors' Thirtieth Omnibus Objection (Amended, Duplicate, No Liability, Satisfied, and Modified) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 Solely with Respect to Claim No. 2238 Filed by Air BP PBF del Peru S.A.C.* ECF No. 2970.
11. *Notice of Revised Proposed Order Pursuant to the Debtors' Objection to Claim No. 3951 Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 (Reduce and Allow).* ECF No. 2995.
12. *Notice of Withdrawal of Debtors' Thirtieth Omnibus Objection*

*(Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007 Solely with Respect to Claim No. 4558 Filed by IC AirLease One Limited. ECF No. 2998.*

13. *Notice of Revised Proposed Order Pursuant to the Debtors' Thirtieth Omnibus Objection (Non-Substantive) to Certain Claims Pursuant to 11 U.S.C. 502 and Fed. R. Bankr. P. 3007. ECF No. 3003.*

- iv. **Status:** This matter is proceeding on an uncontested basis, except for Claims No. 784, 2238, 2697, 2916, 3097, 3148, 3185, 3434, 3435, 4558, and 6130 (as to which the Objection has been adjourned or withdrawn).

7. **Lease Agreement Motion - Orix.** *Debtors' Motion for an Order Authorizing the Debtors to Enter Into New Lease Agreements With Orix Aviation Systems Limited (MSNs 63316 and 63321). ECF No. 2855.*

- i. **Response Deadline:** August 19, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:** None.
- iv. **Status:** This matter is proceeding on an uncontested basis.

8. **Lease Amendment Agreement Motion – SL Alcyone.** *Debtors' Motion for an Order Authorizing the Debtors to Implement Certain Transactions, Including Entry Into a Guarantee Confirmation and Lease Amendment Agreement With SL Alcyone Ltd. (MSN 5101). ECF No. 2862.*

- i. **Response Deadline:** August 19, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:** None.
- iv. **Status:** This matter is proceeding on an uncontested basis.

9. **Lease Amendment Agreement Motion – Yamasa.** *Debtors' Motion for an Order Authorizing the Debtors to Implement Certain Transactions, Including Entry Into Lease Amendment Agreements with Yamasa Sangyo Aircraft LA1 Kumiai and Yamasa Sangyo Aircraft LA2 Kumiai. ECF No. 2863.*

- i. **Response Deadline:** August 19, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:** None.

iv. **Status:** This matter is proceeding on an uncontested basis.

**10. Sale and Leaseback Agreement Motion – Sky Aero.** *Debtors' Motion for an Order Authorizing the Debtors to Implement Certain Transactions, Including Entry Into Sale and Leaseback Agreements with Sky Aero Management Ltd..* ECF No. 2864.

- i. **General Response Deadline:** August 19, 2021 at 4:00 P.M.
- ii. **UCC, AHG, and the Parent AHG Response Deadline:** August 23, 2021 at 12:00 P.M.
- iii. **Responses Received:** None.
- iv. **Related Documents:** None.
- v. **Status:** This matter is proceeding on an uncontested basis.

**11. Lease Amendment Agreement Motion – Dia Patagonia and Dia Iguazu.** *Debtors' Motion for an Order Authorizing the Debtors to Implement Certain Transactions, Including Entry Into Lease Amendment Agreements with Dia Patagonia Ltd. and Dia Iguazu Ltd.* ECF No. 2865.

- i. **Response Deadline:** August 19, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:** None.
- iv. **Status:** This matter is proceeding on an uncontested basis.

**12. Lease Amendment Agreement Motion – Condor Leasing, FC Initial Leasing, Alma Leasing Co, and FI Timothy Leasing.** *Debtors' Motion for an Order Authorizing the Debtors to Implement Certain Transactions, Including Entry Into Lease Amendment Agreements with Condor Leasing Co., Ltd., FC Initial Leasing Ltd., Alma Leasing Co., Ltd., and FI Timothy Leasing Ltd.* ECF No. 2866.

- i. **Response Deadline:** August 19, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:** None.
- iv. **Status:** This matter is proceeding on an uncontested basis.

**13. Lease Amendment Agreement Motion – Gallo Finance.** *Debtors' Motion for an Order Authorizing the Debtors to Implement Certain Transactions, Including Entry Into Amended and Restated Lease Agreements with Gallo Finance Limited.* ECF No. 2868.

- i. **Response Deadline:** August 19, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:**
  - 1. *Notice of Revised Exhibit to Debtors' Motion for an Order Authorizing the Debtors to Implement Certain Transactions, Including Entry Into Amended and Restated Lease Agreements With Gallo Finance Limited.* ECF No. 3004.
- iv. **Status:** This matter is proceeding on an uncontested basis.

**14. Omnibus Amendment Agreement Motion – Platero.** *Debtors' Motion for an Order Authorizing the Debtors to Implement Certain Transactions, Including Entry Into an Omnibus Amendment Agreement (The Platero Fleet).* ECF No. 2869.

- i. **Response Deadline:** August 19, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:**
  - 1. *Notice of Revised Proposed Order.* ECF No. 2975.
- iv. **Status:** This matter is proceeding on an uncontested basis.

**15. Assumption Motion – Airbus.** *Debtors' Motion for an Order Authorizing the Assumption and Ratification of Certain Agreements with Airbus S.A.S.* ECF No. 2871.

- i. **General Response Deadline:** August 19, 2021 at 4:00 P.M.
- ii. **UCC, AHG, and the Parent AHG Response Deadline:** August 23, 2021 at 12:00 P.M.
- iii. **Responses Received:** None.
- iv. **Related Documents:** None.
- v. **Status:** This matter is proceeding on an uncontested basis.

**16. Settlement Stipulation Motion – MTU.** *Debtors' Motion for Entry of an Order Approving Settlement Stipulation and Order By and Among the Debtors and MTU Maintenance Lease Services B.V. and MTU Maintenance Hannover GMBH.* ECF No. 2872.

- i. **Response Deadline:** August 19, 2021 at 4:00 P.M.



- ii. **Responses Received:** None.
- iii. **Related Documents:** None.
- iv. **Status:** This matter is proceeding on an uncontested basis.

**17. Financing Agreement Motion – Airbus and Banco Santander.** *Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Implement Certain Transactions, Including (A) Assumption of Certain Financing Agreements and (B) Entry Into Financing Agreement Amendments With Airbus S.A.S. and Banco Santander, S.A., (II) Approving the Settlement Agreement.* ECF No. 2873.

- i. **General Response Deadline:** August 19, 2021 at 4:00 P.M.
- ii. **UCC, AHG, and the Parent AHG Response Deadline:** August 23, 2021 at 12:00 P.M.
- iii. **Responses Received:** None.
- iv. **Related Documents:** None.
- v. **Status:** This matter is proceeding on an uncontested basis.

**18. Lease Agreement Motion – Avolon Aerospace.** *Debtors' Motion for an Order Authorizing the Debtors to Implement Certain Transactions, Including Entry Into Lease Agreements with Avolon Aerospace Leasing Limited or its Affiliates.* ECF No. 2875.

- i. **Response Deadline:** August 19, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:** None.
- iv. **Status:** This matter is proceeding on an uncontested basis.

**19. Aircraft Purchase Agreement Motion – Wacapou.** *Debtors' Motion for an Order Authorizing the Debtors to Implement Certain Transactions, Including Entry Into Aircraft Purchase Agreement With Wacapou Leasing S.A. (MSN 3662).* ECF No. 2877.

- i. **Response Deadline:** August 19, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:** None.
- iv. **Status:** This matter is proceeding on an uncontested basis.

**20. Lease Amendment Agreement Motion – NBB Crow.** *Debtors' Motion for an Order Authorizing the Debtors to Implement Certain Transactions, Including Entry Into a Lease Amendment Agreement with NBB Crow Co., Ltd.* ECF No. 2878.

- i. **Response Deadline:** August 19, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:** None.
- iv. **Status:** This matter is proceeding on an uncontested basis.

**21. Transactions Motion – NBB Entities.** *Debtors' Motion for an Order Authorizing the Debtors to Implement Certain Transactions with NBB Entities (MSNs 4570, 5066).* ECF No. 2879.

- i. **Response Deadline:** August 19, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:**
  - 1. *Stipulation and Order By and Between the Debtors and Certain Aircraft Counterparties (MSNs 4570 & 5066).* ECF No. 2941.
- iv. **Status:** This matter is proceeding on an uncontested basis.

**22. FTI Interim Fee Application.** *Third Application of FTI Consulting, Inc., Financial Advisor for the Debtors, for Interim Allowance of Hourly Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred from February 1, 2021 through May 31, 2021.* ECF No. 2700.

- i. **Response Deadline:** July 29, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:**
  - 1. *Notice of Filing of Proposed Order Granting Interim Applications for Allowance of Compensation and Reimbursement of Expenses.* ECF No. 3020.
- iv. **Status:** This matter is proceeding on an uncontested basis.

**23. BCG Interim Fee Application.** *First Application of the Boston Consulting Group, Inc. and the Boston Consulting Group UK LLP, Strategic Advisor for the Debtors, for Interim Allowance of Fixed Rate Compensation for Professional Services Rendered from February 3, 2021 through March 31, 2021.* ECF No.

2701.

- i. **Response Deadline:** July 29, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:**
  - 1. *Notice of Filing of Proposed Order Granting Interim Applications for Allowance of Compensation and Reimbursement of Expenses.* ECF No. 3020.
- iv. **Status:** This matter is proceeding on an uncontested basis.

24. **E&Y Interim Fee Application.** *Third Application of Ernst & Young Auditores Independentes S.S. As Auditors for the Brazilian Debtors, for Interim Allowance of Compensation for Professional Services Rendered on a Fixed Fee Basis, and for Reimbursement of Expenses Incurred from February 1, 2021 through May 31, 2021.* ECF No. 2702.

- i. **Response Deadline:** July 29, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:**
  - 1. *Notice of Filing of Proposed Order Granting Interim Applications for Allowance of Compensation and Reimbursement of Expenses.* ECF No. 3020.
- iv. **Status:** This matter is proceeding on an uncontested basis.

25. **Deloitte Impuestos Y Servicios Legales, S.C Interim Fee Application.** *Third Application of Deloitte Impuestos Y Servicios Legales, S.C., Tax Consultants for the Debtors for Interim Allowance of Fixed Compensation for Professional Services Rendered for the Period February 1, 2021 through May 31, 2021.* ECF No. 2704.

- i. **Response Deadline:** July 29, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:**
  - 1. *Notice of Filing of Proposed Order Granting Interim Applications for Allowance of Compensation and Reimbursement of Expenses.* ECF No. 3020.
- iv. **Status:** This matter is proceeding on an uncontested basis.

**26. PricewaterhouseCoopers Consultores Auditores SpA Interim Fee**

**Application.** *Second Application of PricewaterhouseCoopers Consultores Auditores SpA, External Auditors for the Debtors for Interim Allowance of Compensation for Professional Services Rendered (Fixed and Hourly Fees) and Reimbursement of Necessary Expenses Incurred from February 1, 2021 through May 31, 2021.* ECF No. 2705.

- i. **Response Deadline:** July 29, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:**
  - 1. *Notice of Filing of Proposed Order Granting Interim Applications for Allowance of Compensation and Reimbursement of Expenses.* ECF No. 3020.
- iv. **Status:** This matter is proceeding on an uncontested basis.

**27. Togut Interim Fee Application.** *Third Application of Togut, Segal & Segal LLP, Co Counsel for the Debtors, for Interim Allowance of Hourly Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred from February 1, 2021 through May 31, 2021.* ECF No. 2707.

- i. **Response Deadline:** July 29, 2021 at 4:00 P.M.
- ii. **Responses Received:**
  - 1. The United States Trustee has provided informal comments.
- iii. **Related Documents:**
  - 1. *Notice of Filing of Proposed Order Granting Interim Applications for Allowance of Compensation and Reimbursement of Expenses.* ECF No. 3020.
- iv. **Status:** The informal comments from the United States Trustee have been resolved and this matter is proceeding on an uncontested basis.

**28. Claro Interim Fee Application.** *Third Application of Claro & Cia, Special Chilean Counsel for the Debtors, for Interim Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred from June 1, 2020 Through and Including May 31, 2021.* ECF No. 2709.

- i. **Response Deadline:** July 29, 2021 at 4:00 P.M.

ii. **Responses Received:** None.

iii. **Related Documents:**

1. *Notice of Filing of Proposed Order Granting Interim Applications for Allowance of Compensation and Reimbursement of Expenses.* ECF No. 3020.

iv. **Status:** This matter is proceeding on an uncontested basis.

29. **Demarest Interim Fee Application.** *Third Application of Demarest Advogados, Special Brazilian Counsel for the Debtors, for Interim Allowance of Hourly Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred from February 1, 2021 through May 31, 2021.* ECF No. 2710.

i. **Response Deadline:** July 29, 2021 at 4:00 P.M.

ii. **Responses Received:** None.

iii. **Related Documents:**

1. *Notice of Filing of Proposed Order Granting Interim Applications for Allowance of Compensation and Reimbursement of Expenses.* ECF No. 3020.

iv. **Status:** This matter is proceeding on an uncontested basis.

30. **Cleary Interim Fee Application.** *Third Application of Cleary Gottlieb Steen & Hamilton LLP, Counsel for the Debtors, for Interim Allowance of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred from February 1, 2021 through May 31, 2021.* ECF No. 2711.

i. **Response Deadline:** July 29, 2021 at 4:00 P.M.

ii. **Responses Received:**

1. The United States Trustee has provided informal comments.

iii. **Related Documents:**

1. *Notice of Filing of Proposed Order Granting Interim Applications for Allowance of Compensation and Reimbursement of Expenses.* ECF No. 3020.

iv. **Status:** The informal comments from the United States Trustee have been resolved and this matter is proceeding on an uncontested basis.

**31. Deloitte Colombia Interim Fee Application.** *Third Application of D Contadores LTDA, Deloitte Colombia As Tax Outsourcing Service Provider for the Debtors, For Interim Allowance of Fixed Rate Compensation for Professional Services Rendered from February 1, 2021 through May 31, 2021.* ECF No. 2712.

- i. **Response Deadline:** July 29, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:**
  - 1. *Notice of Filing of Proposed Order Granting Interim Applications for Allowance of Compensation and Reimbursement of Expenses.* ECF No. 3020.
- iv. **Status:** This matter is proceeding on an uncontested basis.

**32. LBCA Interim Fee Application.** *Third Application of Lee, Brock, Camargo, Advogados, Local Brazilian Litigation Counsel to the Debtors, for Interim Allowance of Compensation (Fixed, Hourly and Contingency Fees) for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred from February 1, 2021 through May 31, 2021.* ECF No. 2715.

- i. **Response Deadline:** July 29, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:**
  - 1. *Notice of Filing of Proposed Order Granting Interim Applications for Allowance of Compensation and Reimbursement of Expenses.* ECF No. 3020.
- iv. **Status:** This matter is proceeding on an uncontested basis.

**33. Brigard Interim Fee Application.** *Third Application of Brigard & Urritia Abogados S.A.S. As Special Counsel for the Debtors, for Interim Allowance of Hourly and Fixed Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses Incurred from February 1, 2021 through May 31, 2021.* ECF No. 2716.

- i. **Response Deadline:** July 29, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:**
  - 1. *Exhibit "5" – Budget.* ECF No. 3018.

2. *Notice of Filing of Proposed Order Granting Interim Applications for Allowance of Compensation and Reimbursement of Expenses.* ECF No. 3020.

iv. **Status:** This matter is proceeding on an uncontested basis.

**34. Deloitte Advisory SpA Interim Fee Application.** *Third Application of Deloitte Advisory SpA Tax Service Providers for the Debtors, for Interim Allowance of Fixed Compensation for Professional Services Rendered from February 1, 2021 through May 31, 2021.* ECF No. 2717.

- i. **Response Deadline:** July 29, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:**
  1. *Notice of Filing of Proposed Order Granting Interim Applications for Allowance of Compensation and Reimbursement of Expenses.* ECF No. 3020.

iv. **Status:** This matter is proceeding on an uncontested basis.

**35. PJT Interim Fee Application.** *Third Application of PJT Partners As Investment Banker to the Debtors and Debtors In Possession for Allowance of Fixed Compensation for Services Rendered and for Reimbursement of All Actual and Necessary Expenses Incurred for the Period February 1, 2021 through May 31, 2021.* ECF No. 2718.

- i. **Response Deadline:** July 29, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:**
  1. *Notice of Filing of Proposed Order Granting Interim Applications for Allowance of Compensation and Reimbursement of Expenses.* ECF No. 3020.

iv. **Status:** This matter is proceeding on an uncontested basis.

**36. Dechert Interim Fee Application.** *Third Interim Fee Application of Dechert LLP for Compensation for Services Rendered and Reimbursement of Expenses as Counsel to the Official Committee of Unsecured Creditors for the Period from February 1, 2021 Through May 31, 2021.* ECF No. 2719.

- i. **Response Deadline:** July 29, 2021 at 4:00 P.M.
- ii. **Responses Received:**

1. The United States Trustee has provided informal comments.

iii. **Related Documents:**

1. *Notice of Filing of Proposed Order Granting Interim Applications for Allowance of Compensation and Reimbursement of Expenses.* ECF No. 3020.

- iv. **Status:** The informal comments from the United States Trustee have been resolved and this matter is proceeding on an uncontested basis.

**37. Klestadt Interim Fee Application.** *Third Interim Fee Application of Klestadt Winters Jureller Southard & Stevens, LLP for Compensation for Services Rendered and Reimbursement of Expenses as Counsel to the Official Committee of Unsecured Creditors for the Period from February 1, 2021 Through May 31, 2021.* ECF No. 2720.

- i. **Response Deadline:** July 29, 2021 at 4:00 P.M.

- ii. **Responses Received:** None.

iii. **Related Documents:**

1. *Notice of Filing of Proposed Order Granting Interim Applications for Allowance of Compensation and Reimbursement of Expenses.* ECF No. 3020.

- iv. **Status:** This matter is proceeding on an uncontested basis.

**38. RPC Abogados Interim Fee Application.** *Summary and Third Application of RPC Abogados CIA LTDA, As Tax Compliance Service Provider for the Debtors for Interim Allowance of Fixed Rate Compensation for Professional Services Rendered from February 1, 2021 through May 31, 2021.* ECF No. 2721.

- i. **Response Deadline:** July 29, 2021 at 4:00 P.M.

- ii. **Responses Received:** None.

iii. **Related Documents:**

1. *Notice of Filing of Proposed Order Granting Interim Applications for Allowance of Compensation and Reimbursement of Expenses.* ECF No. 3020.

- iv. **Status:** This matter is proceeding on an uncontested basis.

**39. Deloitte Peru Interim Fee Application.** *Third Application of Deloitte Peru As Tax Outsourcing Service Provider for the Debtors for Interim Allowance of Fixed Rate Compensation for Professional Services Rendered from February 1, 2021*



*through May 31, 2021. ECF No. 2722.*

- i. **Response Deadline:** July 29, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:**
  - 1. *Notice of Filing of Proposed Order Granting Interim Applications for Allowance of Compensation and Reimbursement of Expenses. ECF No. 3020.*
- iv. **Status:** This matter is proceeding on an uncontested basis.

**40. Conway MacKenzie Interim Fee Application.** *Second Interim Fee Application of Conway MacKenzie, LLC for Compensation Earned and Expenses Incurred as Financial Advisor to the Official Committee of Unsecured Creditors for the Period from February 1, 2021 Through May 31, 2021. ECF No. 2723.*

- i. **Response Deadline:** July 29, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:**
  - 1. *Notice of Filing of Proposed Order Granting Interim Applications for Allowance of Compensation and Reimbursement of Expenses. ECF No. 3020.*
- iv. **Status:** This matter is proceeding on an uncontested basis.

**41. Ferro Interim Fee Application.** *Third Interim Fee Application of Ferro, Castro Neves, Daltro & Gomide Advogados for Compensation for Services Rendered and Reimbursement of Expenses as Brazilian Counsel to the Official Committee of Unsecured Creditors for the Period from February 1, 2021 Through May 31, 2021. ECF No. 2725.*

- i. **Response Deadline:** July 29, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:**
  - 1. *Notice of Filing of Proposed Order Granting Interim Applications for Allowance of Compensation and Reimbursement of Expenses. ECF No. 3020.*
- iv. **Status:** This matter is proceeding on an uncontested basis.

42. **Morales & Besa Interim Fee Application.** *Third Interim Fee Application of Morales & Besa LTDA for Compensation for Services Rendered and Reimbursement of Expenses as Chilean Counsel to the Official Committee of Unsecured Creditors for the Period from February 1, 2021 Through May 31, 2021.* ECF No. 2730.

- i. **Response Deadline:** July 29, 2021 at 4:00 P.M.
- ii. **Responses Received:** None.
- iii. **Related Documents:**
  - 1. *Notice of Filing of Proposed Order Granting Interim Applications for Allowance of Compensation and Reimbursement of Expenses.* ECF No. 3020.
- iv. **Status:** This matter is proceeding on an uncontested basis.

### **III. CONTESTED MATTERS**

43. **Omnibus CAXDAC Claims Objection Motion (Substantive).** *Debtors' Twenty-Eighth Omnibus Objection (Substantive) to Certain Claims filed by CAXDAC Pursuant to 11 U.S.C. 502(b)(1) and Fed. R. Bankr. P. 3007.* ECF No. 2733.

- i. **Response Deadline:** August 16, 2021 at 4:00 P.M.
- ii. **Responses Received:**
  - 1. *Opposition of CAXDAC to the Debtors' Twenty-Eight Objection (Substantive) to Certain Claims Filed by CAXDAC.* ECF No. 2942.
  - 2. *Debtors' Reply to CAXDAC's Opposition to the Debtors' Twenty-Eighth Objection (Substantive) to Certain Claims filed by CAXDAC.* ECF No. 3001.
- iii. **Related Documents:** None.
- iv. **Status:** This matter is proceeding on a contested basis.

44. **Shareholders' Committee Rule 2004 Motion.** *Motion to Ad Hoc Committee of Shareholders for Entry of Order Authorizing and Directing Discovery from Debtors Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure.* ECF No. 2819.

- i. **Response Deadline:** August 19, 2021 at 4:00 P.M.

ii. **Responses Received:**

1. *Debtors' Opposition to Motion of Ad Hoc Committee of Shareholders for Entry of Order Authorizing and Directing Discovery from Debtors Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure.* ECF No. 2968.
2. *Ad Hoc Committee of Shareholders' Omnibus (I) Reply in Support of Motion for Entry of Order Authorizing and Directing Discovery from Debtors Pursuant to Rule 2004 of Federal Rules of Bankruptcy Procedure and (II) Limited Objection to Proposed Order Appointing Mediator and Establishing Procedures for Mediation.* ECF No. 3002.

iii. **Related Documents:** None.

iv. **Status:** This matter is proceeding on a contested basis.

**IV. ADJOURNED MATTERS**

1. **Rule 2004 Motion.** *Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004.* ECF No. 1171.

i. **Response Deadline:** October 13, 2020 at 4:00 P.M.

ii. **Responses Received:**

1. *Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for Entry of Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004.* ECF No. 1186.
2. *Joinder of Aircraft Counterparties to Objection of The Official Committee Of Unsecured Creditors To The Debtors' Motion For Entry of Order Establishing Procedures for The Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant To Bankruptcy Rule 2004.* ECF No. 1188.
3. *Joinder of BNP Paribas and Certain Export Credit Agencies to Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for Entry of Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004.* ECF No. 1189.

4. *Joinder of Contract Counterparties to the Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004.* ECF No. 1190.
5. *Joinder of Aircraft Counterparty to the Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004.* ECF No. 1191.
6. *Joinder of Aircraft Counterparty to the Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for Entry of Order Establishing Procedures for the Debtors Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004.* ECF No. 1192.
7. *Joinder to Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for Entry of Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004.* ECF No. 1194.
8. *Joinder to Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for Entry of an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004.* ECF No. 1195.
9. *Joinder of Avolon Aerospace to the Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for Entry of Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004.* ECF No. 1201.
10. *Joinder of Crédit Agricole Corporate and Investment Bank, as Agent Under the Spare Engine Facility, to the Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for Entry of Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of*

*Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 1202.*

11. *Joinder of Natixis, as Agent Under the Yeco and Jacana Facilities, to the Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion for Entry of Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 1203.*

iii. **Related Documents:**

1. *Notice of Adjournment of Hearing on Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 1332.*
2. *Notice of Adjournment of Hearing on Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 1478.*
3. *Notice of Adjournment of Hearing on Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 1631.*
4. *Notice of Adjournment of Hearing on Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 1864.*
5. *Notice of Adjournment of Hearing on Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 2062.*
6. *Notice of Adjournment of Hearing on Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004. ECF No. 2219.*

7. *Notice of Adjournment of Hearing on Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004.* ECF No. 2348.
8. *Notice of Adjournment of Hearing on Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004.* ECF No. 2562.
9. *Notice of Adjournment of Hearing on Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004.* ECF No. 2757.
10. *Notice of Adjournment of Hearing on Debtors' Motion for an Order Establishing Procedures for the Debtors' Issuance of Subpoenas for the Production of Documents and Authorizing the Examination of Persons and Entities Pursuant to Bankruptcy Rule 2004.* ECF No. 2943.

iv. **Status:** This matter is adjourned to the September 23, 2021 omnibus hearing.

2. **MTU Motion for Payment of Administrative Expenses.** *Motion for Allowance and Payment of MTU Maintenance Lease Services B.V.'s Administrative Expense Lease Rejection Claim.* ECF No. 1489.

- i. **Response Deadline:** May 12, 2021 at 4:00 P.M.
- ii. **Responses Received:** The deadline for responses is May 12, 2021.
- iii. **Related Documents:**
  1. *Notice of Adjournment of Hearing on Motion for Allowance and Payment of MTU Maintenance Lease Services B.V.'s Administrative Expense Lease Rejection Claim.* ECF No. 1862.
  2. *Notice of Adjournment of Hearing on Motion for Allowance and Payment of MTU Maintenance Lease Services B.V.'s Administrative Expense Lease Rejection Claim.* ECF No. 2325.
  3. *Notice of Adjournment of Hearing on Motion for Allowance and Payment of MTU Maintenance Lease Services B.V.'s Administrative Expense Lease Rejection Claim.* ECF No. 2937.

- iv. **Status:** This matter was adjourned *sine die*.
3. **Motion to Reject Aircraft.** *Debtors' Third Motion for Entry of an Order (I) Authorizing Debtors to Reject Certain Aircraft Leases and Abandon Certain Aircraft and (II) Approving Return Procedures* (MSNs 2924, 5666, and 5654). ECF No. 735.
- i. **Response Deadline:** August 19, 2021 at 12:00 P.M.
  - ii. **Responses Received:** None.
  - iii. **Related Documents:** None.
  - iv. **Status:** This matter is adjourned to the September 23, 2021 omnibus hearing.
4. **Motion to Reject Aircraft.** *Debtors' Fourth Motion for Entry of an Order (I) Authorizing Debtors to Reject Certain Aircraft Leases and Abandon Certain Aircraft and (II) Approving Return Procedures* (MSNs 3733, 1304, 1526, 3595, 2894, 2872, 2858, 2845, 5748, 5686, 5707, 5764, 5845, and 5883). ECF No. 1061.
- i. **Response Deadline:** August 19, 2021 at 12:00 P.M.
  - ii. **Responses Received:** None.
  - iii. **Related Documents:** None.
  - iv. **Status:** This matter is adjourned to the September 23, 2021 omnibus hearing.

\*\*\*

Dated: August 25, 2021  
New York, New York

/s/ Lisa M. Schweitzer  
Richard J. Cooper  
Lisa M. Schweitzer  
Luke A. Barefoot  
Thomas S. Kessler  
CLEARY GOTTlieb STEEN &  
HAMILTON LLP  
One Liberty Plaza  
New York, New York 10006  
Telephone: (212) 225-2000  
Facsimile: (212) 225-3999

*Counsel to the Debtors and  
Debtors-in-Possession*